

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

Conrado Cruz Perez, Gerardo Gregorio  
Vega, Juan Francisco Monroy Poredes,  
And Marco Gonzales

PLAINTIFFS

v.

**Civil Action No.: 1:15cv415-HSO-JCG**

Oscar Gonzales, individually; Oscar  
Gonzales d/b/a O.G. Construction a/k/a  
O G Inc.; Ronald Perkins, individually; Ronald  
Perkins d/b/a O.G. Construction a/k/a O G Inc.;  
And Memorial Hospital at Gulfport

DEFENDANTS

**RESPONSE BY PLAINTIFFS TO DEFENDANT'S PARTIAL MOTION TO DISMISS**

Comes now, the Plaintiffs, by and through their undersigned counsel of record and files this their *Response to Defendant's Partial Motion to Dismiss*, and in support of same states as follows, to-wit:

The Defendant, Memorial Hospital at Gulfport (Memorial), filed a Motion (Doc 8), along with a Memorandum in Support, (Doc 9) through which it seeks to dismiss Plaintiffs' claims contained in Count II of the Plaintiffs' Complaint, as against Memorial, for violations under the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA), as well as any state law causes of action.

Since the filing of same, counsel for the Plaintiffs and counsel for the Defendant, Memorial, have reached a resolution of the matters and issues contained in that Motion (Doc 8), and as such, the parties have agreed that the Plaintiffs will, and Plaintiffs do hereby, stipulate to a dismissal *without prejudice* of Plaintiffs' claims and allegations of TVPRA violations as well as any state law causes of action as contained in Count II of the Plaintiffs' Complaint as same

pertains only to Defendant, Memorial Hospital at Gulfport. This stipulation is limited to the claims articulated in Count II and only with regard to Defendant Memorial Hospital at Gulfport.

As such, no further response is required of the Plaintiffs regarding Defendant Memorial's Partial Motion to Dismiss (Doc 8) as all issues contained in have been resolved by stipulation and agreement.

RESPECTFULLY SUBMITTED, this the 11<sup>th</sup> day of April, 2016.

Conrado Cruz Perez, Gerardo Gregorio  
Vega, Juan Francisco Monroy Poredes,  
And Marco Gonzales  
PLAINTIFFS

BY: FOXWORTH LAW OFFICE

/s/ John A Foxworth, Jr.  
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CERTIFICATE OF SERVICE

I, John A. Foxworth, Jr., do hereby certify that I have this day electronically filed the foregoing *Answer* and same has been forwarded to all counsels of record through the Federal PACER filing system.

THIS the 11<sup>th</sup> day of April, 2016.

/s/ John A. Foxworth, Jr.  
JOHN A. FOXWORTH, JR  
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